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Attorney for Plaintiff CHARLES HOGARTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

CHARLES HOGARTY,

Plaintiff,

v.

NEC CORPORATION OF AMERICA, ET AL.

Defendants.

Case No. 3:08-cv-00677-DMS-BLM
Class Action

JOINT MOTIONS FOR
EXTENSION OF TIME FOR
DEFENDANTS NEC
CORPORATION OF AMERICA,
INNOVATIVE EMPLOYEE
SOLUTIONS, INC., AND
DYNAMIC STAFFING, INC. TO
RESPOND TO THE COMPLAINT,
AND FOR SCHEDULING OF
EARLY NEUTRAL EVALUATION

The Honorable Dana M. Sabraw

PLEASE TAKE NOTICE that Defendants NEC Corporation of America, Innovative Employee Solutions, Inc., and Dynamic Staffing, Inc. ("Defendants") and Plaintiff Charles Hogarty ("Plaintiff") hereby jointly move the Court for an order allowing Defendants an extension of time in which to file a responsive pleading to Plaintiff's Complaint until July 28, 2008.

1 Pursuant to Rule 6 of the Civil Pretrial & Trial Procedures of Judge Dana M. Sabraw, counsel for
2 Defendants and Plaintiff have conferred regarding a potential Rule 12(b) motion that Defendants
3 may file regarding transfer of venue. The parties have also discussed potential settlement.

4 Plaintiffs and Defendants also jointly move the Court for the scheduling of an Early
5 Neutral Evaluation conference prior to July 28, 2008, which the parties believe would present a
6 significant opportunity to settle this litigation. All parties are available on July 10 or 14, 2008, if
7 those dates are convenient to the Court.
8

9 Accordingly, the instant request for an extension of time is supported by good cause, and
10 the parties believe that it is in the interest of judicial economy to grant the extension of time.

11 Dated: June 18, 2008

MORRISON & FOERSTER LLP

13 By: /s/
14 Daniel P. Westman,
15 Attorney for Defendant
16 NEC CORPORATION OF AMERICA

17 Dated: June 18, 2008

THIERMAN LAW FIRM

18 By: /s/
19 Mark R. Thierman,
20 Attorney for Plaintiff
21 CHARLES HOGARTY

22 Dated: June 18, 2008

LAW OFFICES OF S. ROSS
KOCHENDERFER, P.C.

24 By: /s/
25 S. Ross Kochenderfer,
26 Attorney for Defendant
27 DYNAMIC STAFFING, INC.
28

1 Dated: June 18, 2008

BLACKMAR, PRINCIPE & SCHMELTER,
P.C.

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3
4 By: /s/
Peter J. Attarian,

5 Attorney for Defendant
6 INNOVATIVE EMPLOYEE
7 SOLUTIONS, INC.
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